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FIRST GENERAL COUNSEL'S REPORT

SENSITIVE

MUR 5305
DATE ACTIVATED: 3/6/03

EXPIRATION OF STATUTE OF
LIMITATIONS: 4/24/06

COMPLAINANT:

Donald F. McGahn II, National Republican
Congressional Committee

RESPONDENTS:

Rhodes Design and Development Co.
James M. Rhodes
James A. Bevan
Donna Escoto
Lori J. Marko
Mona M. Wilcox
Ronald E. Gillette
Nadine Giudicessi
Gary Giudicessi
Dean L. Griffith
Dirk P. Griffith
Margaret Hester
Kevin Hester
Nancy D. Kurtik
Kathryn J. Sanucci
Andrea J. Zoanni
Free Cuba PAC and
Mario L. Del Valle, as Treasurer
Jorge Mas Santos
Aleyda Mas
Herrera for Congress and
Michael W. Kern, as Treasurer
Dario Herrera

RELEVANT STATUTES:

2 U.S.C. § 441f
2 U.S.C. § 441b
2 U.S.C. § 441a(a)
11 C.F.R. § 103.3(b)(2)

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11 C.F.R. § 110.1(h)
11 C.F.R. § 110.4(b)(1)(iii)
11 C.F.R. § 110.9(a)

INTERNAL REPORTS CHECKED: Disclosure Reports
Referral Materials

FEDERAL AGENCIES CHECKED: None

I. INTRODUCTION

Complainant makes two major claims in connection with the 2002 election for Nevada's 3rd Congressional District. First, Complainant alleges that \$27,000 in contributions from persons associated with Rhodes Design and Development Corporation ("RDDC" or "Rhodes") to Herrera for Congress ("the Herrera Committee") were reimbursed in "blatant violation of section 441f's prohibition of conduit contributions[.]" Complaint at 4. Second, Complainant alleges that a \$5,000 contribution from the Free Cuba PAC to the Herrera Committee was made in violation of 2 U.S.C. §§ 441f and 441a(a) because its true source was Jorge Mas Santos and/or his spouse, Aleyda Mas, and "the PAC was merely a pass through entity designed to mask the [Mases'] donation to Herrera." Complaint at 5.

II. FACTUAL AND LEGAL ANALYSIS

A. Rhodes Design and Development Corporation

1. Factual Background

Complainant alleges that contributions to the Herrera Committee by RDDC employees and their spouses were made as part of a reimbursement scheme whereby either James M. Rhodes or RDDC was the true source of the funds. RDDC is a Las Vegas, Nevada-based real estate development corporation, headed by James M. Rhodes.¹ Complainant notes that during the 2002 election cycle, persons associated with RDDC were "prolific givers to the Herrera

¹ Dun & Bradstreet Business Information Report on Rhodes Design & Development Corporation.

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Campaign.” Complaint at 2. In fact, during the period between April 24, 2001 and March 29, 2002, fourteen RDDC employees and two of their spouses (together, “the RDDC contributors”) contributed a total of \$27,000 to the Herrera Committee. These contributions are reflected in an attached table. (Attachment 1.)

Complainant lists the following five factors as evidence that a section 441f violation has occurred:

1. The unusually high number of contributing employees;
2. their lockstep partisan uniformity;
3. the uniformly high amount of each contribution;
4. clustering of contributions on specific dates; and
5. the complete absence of a prior contribution history by employees.

Complaint at 4. Complainant points out that the RDDC contributors range from the company’s CFO and Corporate Counsel to those individuals on the lower rungs of the corporate ladder, such as the Payroll Clerk and Human Resources Manager. Complaint at 2. Moreover, despite their wide range of positions, the RDDC contributors all made the maximum contribution allowed by the Act. *Id.*; *see also* 2 U.S.C. § 441a(a)(1)(A). Complainant further notes that five of the RDDC contributors also made contributions to Friends for Harry Reid (“the Reid Committee”) during the 2002 election cycle.² Aside from those contributions, none of the RDDC contributors (with the exception of James Rhodes) appears to have made any previous or subsequent political contributions.³ On the basis of these facts, Complainant concludes that “[t]he available facts point to a cynical evasion of federal election contribution limitations.” Complaint at 4.

² On June 29, 2001, five of the RDDC contributors made the maximum allowable contribution (in both the primary and general elections) to Friends for Harry Reid, the authorized campaign committee of Senator Harry Reid (D-NV). An attached table reflects these contributions. (Attachment 2.) The five individuals who contributed to the Reid Committee did so just one day before they made their contributions to the Herrera Committee, meaning that each donated a total of \$4,000 over a period of two days. None of these contributors appears ever to have made a political contribution in the past, and none has made a contribution since.

³ Mr. Rhodes contributed \$30,000 between 1997 and 2002 to various candidates, party committees, and other committees.

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1 Rather than contesting Complainant's allegations, the RDDC contributors responded to
2 the Complaint by informing the Commission, through counsel, that they "desire to enter into
3 conciliation to correct any possible violation of the Act." Letter from Wright, Judd, & Winckler
4 (October 23, 2002) (Attachment 3).⁴ Respondents' affirmative request for conciliation together
5 with their omission of any factual response provides strong indication that they do not intend to
6 dispute the allegations in the Complaint.

7 **2. Analysis**

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15 Based on the available information, it appears the RDDC respondents (not including Mr.
16 Rhodes) made the reimbursed contributions with their own personal funds, but did so knowing
17 they would be reimbursed for their contributions. At this stage, however, we do not have
18 evidence to suggest whether the contributions in question were reimbursed with RDDC funds or

⁴ While responses were received from nearly all respondents, the notification letters to Lori Marko and Mona Wilcox were returned by the U.S. Postal Service. This Office is attempting to find current addresses for these respondents. In addition, Donna Escoto appears to have received the letter, but failed to respond. The remaining RDDC contributors responded and, together with James M. Rhodes and RDDC, are all represented by Wright, Judd, & Winckler.

⁵ Because the Complaint contained no formal allegations as to the Reid Committee, it was not generated as a respondent. This Office has no information that would suggest the Reid Committee knew or had reason to know the RDDC contributions were improper. As such, we see no reason to internally generate the Reid Committee as a respondent in this matter.

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1 with James M. Rhodes' personal funds. In either case, reimbursement of the RDDC
2 respondents' contributions would constitute a contribution in the name of another in violation of
3 2 U.S.C. § 441f. Therefore, this Office recommends the Commission find reason to believe
4 James A. Bevan, Donna Escoto, Lori J. Marko, Mona M. Wilcox, Ronald E. Gillette, Nadine
5 Giudicessi, Gary Giudicessi, Dean L. Griffith, Dirk P. Griffith, Margaret Hester, Kevin Hester,
6 Nancy D. Kurtik, Kathryn J. Sanucci, and Andrea J. Zoanni violated 2 U.S.C. § 441f.

7 Reimbursement of these contributions with RDDC funds would also be a prohibited
8 corporate contribution in violation of 2 U.S.C. § 441b(a), while reimbursement with Mr. Rhodes'
9 personal funds would result in an excessive contribution in violation of 2 U.S.C. § 441a(a).

10 Thus, in light of the uncertainty as to the source of the reimbursed funds, this Office recommends
11 reason to believe findings covering both contingencies. In the event RDDC is the source of the
12 funds, we recommend the Commission find reason to believe RDDC violated 2 U.S.C. § 441b(a)
13 by making prohibited corporate contributions and 2 U.S.C. § 441f for making those contributions
14 in the names of others. Under this scenario, James M. Rhodes would also be liable under
15 2 U.S.C. § 441b(a) for consenting to the making of corporate contributions and 2 U.S.C. § 441f
16 for assisting in the making of contributions in the names of others. *See also* 11 C.F.R.
17 § 110.4(b)(iii). However, in the event James M. Rhodes is the true source of the funds, we
18 recommend the Commission find reason to believe James M. Rhodes violated 2 U.S.C.
19 §§ 441a(a)(1)(A) and 441f by making excessive contributions in the names of his employees.

20 The current record contains no information indicating any basis for a reason to believe
21 finding as to the Herrera Committee. As such, we recommend the Commission take no action at
22 this time as to the Herrera Committee. Should this Office discover information suggesting that

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1 either the Herrera Committee or the Reid Committee is liable for any violation, we will
2 recommend appropriate action at that time.

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B. Jorge and Aleyda Mas, the Free Cuba PAC and Mario L. Del Valle, as Treasurer

1. Factual Background

Jorge Mas Santos is the Chairman of both the Cuban American National Foundation (“CANF”) and MasTec, Inc., a publicly traded telecommunications corporation. He is married to Aleyda Mas. CANF is a non-profit institution founded in 1981 and “dedicated to the promotion of a free and democratic Cuba.”

<http://www.canfnet.org/About/aboutjorgemassantos.htm>. The Free Cuba PAC is a non-connected multicandidate committee dedicated to “freeing Cuba from the control of Fidel Castro.” Del Valle Response at 1. Mario L. Del Valle is the Free Cuba PAC’s treasurer.

Complainant alleges that Jorge and Aleyda Mas are the true source of a \$5,000 contribution made by the Free Cuba PAC to the Herrera Committee on April 17, 2002.

Complainant bases this allegation on the Mases’ \$5,000 contributions to the Free Cuba PAC on April 9, 2002 – one week before the Free Cuba PAC’s contribution to the Herrera Committee.

Complainant alleges that “this quick turnaround time suggests that orchestration of the contribution hand-off occurred between the individuals, the Free Cuba PAC, and the Herrera campaign before they contributed on April 9.” Complaint at 5. Complainant also notes that the Free Cuba PAC had only \$2,667 in its “coffers” at the time the contributions in question were made, and that Jorge and Aleyda Mas were the only reported contributors to the Free Cuba PAC in that committee’s July 2002 Quarterly Report. From these facts, Complainant concludes that “the [Free Cuba] PAC was merely a pass through entity designed to mask the individuals’ donation to Herrera, and evade Federal contribution limits.” *Id.*

In their responses, Jorge and Aleyda Mas and the Free Cuba PAC denied they had violated any provision of the Act in connection with the contributions in question. Mr. Mas,

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1 through his attorney, stated that he “does not now, and never has had, control over the Free Cuba
2 PAC, or how the Free Cuba PAC uses donated funds.” Mas Response at 2. He states that his
3 “only affiliation with the Free Cuba PAC has been as a donor” and that “similar donations to the
4 Free Cuba PAC have been made in the past.” *Id.* Regarding the alleged “orchestration,” Mr.
5 Mas states, “[n]o meetings took place [and] no directions were given.” *Id.* According to Mr.
6 Mas’ attorney, “these donations were merely routine donations for Mr. Mas, nothing more.” *Id.*

7 The Free Cuba PAC’s treasurer, Mr. Del Valle, similarly denies the allegations in the
8 Complaint. He states that the Free Cuba PAC “is not now, and has never been, controlled in any
9 way by Jorge or Aleyda Mas, and no facts exist that would support such an allegation.” Del
10 Valle Response at 1. Mr. Del Valle attached to his response a sworn affidavit denying the
11 allegations in the Complaint. *See* Del Valle Response at Exhibit A. In his affidavit, Mr. Del
12 Valle states that “no conversations between Jorge and/or Aleyda Mas and any representative of
13 the Free Cuba PAC took place regarding the use of the funds [in question]” and that “there was
14 no ‘orchestration’ of any nature among the Free Cuba PAC, Jorge and Aleyda Mas, and/or the
15 Herrera campaign.” *Id.* Mr. Del Valle further states that “the Free Cuba PAC received no
16 instructions of any nature whatsoever regarding the use of the funds.” *Id.*

17 2. Analysis

18 The Act prohibits contributions made in the name of another, 2 U.S.C. § 441f, as well as
19 contributions in excess of the Act’s limitations. 2 U.S.C. § 441a(a). However, pursuant to the
20 Commission’s regulations, “a person may contribute to a candidate or his or her authorized
21 committee with respect to a particular election and also contribute to a political committee which
22 has supported or anticipates supporting, the same candidate in the same election, so long as: (i)
23 the political committee is not the candidate’s principal campaign committee or other authorized

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1 political committee or a single candidate committee; (ii) the contributor does not give with the
2 knowledge that a substantial portion will be contributed to, or expended on behalf of, that
3 candidate, for the same election; and (iii) the contributor does not retain control of the funds.”
4 11 C.F.R. § 110.1(h). Where the contributor does retain control of the funds or where
5 contributions are made with the requisite knowledge, the contributions count against the
6 contributor's section 441a(a) limits and any additional amounts are treated as excessive
7 contributions.⁷

8 Complainant is correct that Jorge and Aleyda Mas contributed \$5,000 each to the Free
9 Cuba PAC on April 9, 2001 at a time when the PAC only had “\$2,667 in its coffers,” and that the
10 Free Cuba PAC contributed \$5,000 to the Herrera Committee on April 17, 2001. Complaint at 5.
11 Based on this “quick turnaround,” Complainant draws the reasonable inference that the Free
12 Cuba PAC merely passed along the contributions in questions to the Herrera Committee in
13 violation of 2 U.S.C. § 441f. However, “a complaint may be dismissed if it consists of factual
14 allegations that are refuted by sufficiently compelling evidence produced in responses to the
15 complaint.” Statement of Reasons in MUR 4960 (Hillary Rodham Clinton for U.S. Senate
16 Exploratory Committee, issued December 21, 2000); *see also Orloski v. FEC*, 795 F.2d 156, 168
17 (D.C. Cir. 1986) (at the reason to believe stage in a complaint proceeding, the Commission must
18 “make a subjective evaluation of the claims”). Here, Complainant's inferences are convincingly
19 refuted by the responses of Jorge Mas and Mario L. Del Valle. These responses, denying the
20 facts as alleged, are bolstered substantially by the available information which demonstrates a

⁷ Although not mentioned in the complaint, Mr. Mas contributed \$2,000 to the Herrera Committee on April 18, 2001. The \$2,000 contribution was allocated between the primary and general elections. Thus, if Mr. Mas made the maximum allowable contribution to the Herrera Committee and also “maxed out” to the Free Cuba PAC with the knowledge that the latter committee would use his money for its contribution to the Herrera Committee, he would have made an excessive contribution of as much as \$5,000 2 U.S.C. § 441a(a)(1); 11 C.F.R. § 110.1(h)

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1 sustained pattern of contributions that makes the otherwise suspicious contributions appear, in
2 Mr. Mas' words, "merely routine." Mas Response at 2.

3 Mr. Mas states that he is a "frequent and generous donor to political interest groups,
4 campaigns, and organizations involved in promoting a free Cuba." *Id.* This assertion is amply
5 supported by the available information.⁸ Indeed, Mr. Mas has made numerous – almost yearly –
6 contributions to the Free Cuba PAC:

7 **CONTRIBUTIONS BY JORGE MAS**
8 **TO THE FREE CUBA PAC⁹**
9 **(Since 1991)**

DATE	AMOUNT
4/30/91	\$5,000
6/2/92	\$500
12/9/93	\$5,000
6/29/94	\$2,500
1/1/96	\$1,500
3/10/97	\$3,000
4/13/98	\$1,000
7/14/98	\$4,000
6/19/00	\$5,000
4/9/02	\$5,000

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11 The information reflected in this chart demonstrates Mr. Mas' longstanding pattern of
12 contributions to the Free Cuba PAC. This pattern is indicative of Mr. Mas' advocacy for issues
13 important to the Cuban-American community through both public service and financial support
14 of political committees (like the Free Cuba PAC) and candidates (like Dario Herrera)
15 sympathetic to Cuban-American causes. Far from anomalous, the contributions at issue in the

⁸ Between 1998 and 2002, Mr Mas contributed \$35,200 to candidates, PACs, and party committees

⁹ Aleyda Mas contributed \$5,000 to the Free Cuba PAC on 10/29/98, and \$5,000 on 4/9/02.

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1 Complaint are properly viewed as examples of this continued support. Indeed, Mr. Herrera, a
2 Miami-born Cuban-American, was not the first Cuban-American candidate Mr. Mas has
3 supported and was not even the only Cuban-American candidate Mr. Mas supported in the 2002
4 election.¹⁰ These facts are clearly distinguishable from those cases where the Commission has
5 found excessive contributions in violation of the Act under a §110.1(h) theory.

6 In MUR 4389/4652 (Prince for Congress), the Commission found reason to believe and
7 approved conciliation agreements in the case of Debra Lee and Paul LaPrade who violated
8 2 U.S.C. § 441a(a)(1)(C) when they contributed \$5,000 each to the Orange County (California)
9 Democratic Central Committee ("OCDP"), and \$2,000 each to the Prince for Congress
10 committee. The Commission found that the LaPrades knew a substantial portion of their
11 contribution to the OCDP would be contributed to the Prince Committee. In contrast to the
12 instant case, however, the LaPrades were not routine political contributors, had never before
13 given to the OCDP, and had no connection to the OCDP except for their relationship to the
14 candidate – Ms. LaPrade's brother.

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¹⁰ Mr. Mas contributed \$500 to Mario Diaz-Balart for Congress on July 5, 2002, and \$1,000 to the Lincoln Diaz-Balart for Congress Committee on October 30, 1998. Both Congressmen are Cuban-American. Dario Herrera's election would have given "Cuban Americans a five-member bloc in the U.S. House." Carol Rosenberg, *Same Sex Marriage on Nevada Ballot*, Miami Herald, October 28, 2002.

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Jorge and Aleyda Mas are routine contributors to the Free Cuba PAC, an organization that supports candidates sympathetic to their well-established and longstanding political goals. the Mases contributed \$10,000 to the Free Cuba PAC, even though the PAC could only contribute \$5,000 to the Herrera campaign. Were this the first and only time the couple had contributed to the Free Cuba PAC, a contribution beyond the PAC's \$5,000 limit, as in the Prince matter, could be viewed as a "pay-off" to the PAC in return for its willingness to contribute to the desired candidate. However, in light of Jorge and Aleyda Mas' consistent support of the Free Cuba PAC, that scenario appears unlikely. More likely is that the Mases' 2002 contributions to the Free Cuba PAC were "merely routine."¹¹

In sum, Complainant's otherwise reasonable inferences based on the transactions at issue are compellingly answered by evidence produced in response to the Complaint as well as publicly available information. As such, we recommend the Commission find no reason to believe Jorge or Aleyda Mas, the Free Cuba PAC or Mario L. Del Valle, as Treasurer, or the Herrera Committee or Michael W. Kern, as Treasurer, violated the Act in connection with the contributions at issue.

III. RECOMMENDATIONS

1. Find reason to believe James M. Rhodes and Rhodes Design and Development Corporation violated 2 U.S.C. §§ 441f and 441b(a).
2. Find reason to believe James M. Rhodes violated 2 U.S.C. § 441a(a)(1)(A).

¹¹ Complainant alleges the fact that the Free Cuba PAC had only \$2,667 on hand at the time the contributions in question were made indicates the Mases knew their contributions would be used towards the PAC's contribution to the Herrera Committee. While it is true that the Free Cuba PAC could not have made the maximum contribution to the Herrera Committee on April 17, 2002 without the Mases' contributions, the PAC could have made that contribution as early as July 18, 2002, when it received a \$2,500 contribution. By August 15, 2002, the Free Cuba PAC had \$20,167 cash-on-hand.

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3. Find reason to believe James A. Bevan, Donna Escoto, Lori J. Marko, Mona M. Wilcox, Ronald E. Gillette, Nadine Giudicessi, Gary Giudicessi, Dean L. Griffith, Dirk P. Griffith, Margaret Hester, Kevin Hester, Nancy D. Kurtik, Kathryn J. Sanucci, and Andrea J. Zoanni violated 2 U.S.C. § 441f.
4. Approve the attached Factual and Legal Analyses.
- 5.
- 6.
7. Find no reason to believe Jorge and Aleyda Mas violated 2 U.S.C. § 441f, and close the file as to these respondents.
8. Find no reason to believe Free Cuba PAC and Mario L. Del Valle, as Treasurer, violated 2 U.S.C. § 441f, and close the file as to these respondents.
9. Approve the appropriate letters.

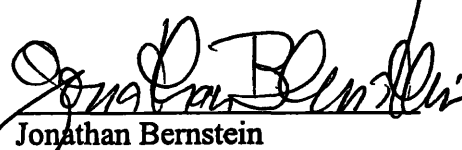
Lawrence H. Norton
General Counsel


Date

1/16/07

BY:


Rhonda J. Vosdinger
Associate General Counsel
for Enforcement


Jonathan Bernstein
Assistant General Counsel


Jesse B. Christensen
Attorney

Attachments:

1. Table reflecting RDDC contributors' contributions to the Herrera Committee.
2. Table reflecting RDDC contributors' contributions to the Reid Committee.

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MUR 5305
First General Counsel's Report

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**RHODES CONTRIBUTORS'
CONTRIBUTIONS TO HERRERA COMMITTEE**

Date of Contribution	Name of Contributor	Employer/Occupation	Amount	Election Designation
4/24/01	James M Rhodes	Rhodes Design	\$1,000	Primary
4/24/01	Donna Escoto	Rhodes Construction/ Director of Purchasing	\$1,000	Primary
4/24/01	Nancy D Kurtik	Rhodes Construction/ Director of Sales	\$1,000	Primary
4/24/01	Lori J Marko	Rhodes Construction/ Escrow Manager	\$1,000	Primary
4/24/01	Kathryn J Sanucci	Rhodes Construction/ Product Supervisor	\$1,000	Primary
6/30/01	Lori J Marko	Rhodes Construction/ Escrow Manager	\$1,000	General
6/30/01	Kathryn J Sanucci	Rhodes Construction/ Product Supervisor	\$1,000	General
6/30/01	James A Bevan	Rhodes Design/CFO	\$1,000	General
6/30/01	James A Bevan	Rhodes Design/ CFO	\$1,000	Primary
6/30/01	Nadine Giudicessi	Rhodes Design/ Controller	\$1,000	General
6/30/01	Nadine Giudicessi	Rhodes Design/ Controller	\$1,000	Primary
6/30/01	Dean L Griffith	Rhodes Design/ General Manager	\$1,000	General
6/30/01	Dean L Griffith	Rhodes Design/ General Manager	\$1,000	Primary
6/30/01	Dirk P Griffith	Rhodes Design/ General Supervisor	\$1,000	General
6/30/01	Dirk P Griffith	Rhodes Design/ General Supervisor	\$1,000	Primary
6/30/01	Margaret Hester	Rhodes Design/ HR Manager	\$1,000	General
6/30/01	Andrea J Zoanni	Rhodes Design/ Payroll Clerk	\$1,000	Primary
6/30/01	Andrea J Zoanni	Rhodes Design/ Payroll Clerk	\$1,000	Primary
6/30/01	Mona M Wilcox	Rhodes Framing/ Controller	\$1,000	General
6/30/01	Mona M Wilcox	Rhodes Framing/ Controller	\$1,000	Primary
12/17/01	James M Rhodes	Rhodes Design	\$1,000	General
3/29/02	Gary Giudicessi	Imperial Palace/ Hotel Security	\$1,000	Primary
3/29/02	Gary Giudicessi	Imperial Palace/ Hotel Security	\$1,000	General
3/29/02	Margaret Hester	Rhodes Design/ HR Manager	\$1,000	General
3/29/02	Kevin Hester	Ry/Sys Management/ Painter	\$1,000	Primary
3/29/02	Ronald E Gillette	Rhodes Homes/ Corporate Counsel	\$1,000	General
3/29/02	Ronald E Gillette	Rhodes Homes/ Corporate Counsel	\$1,000	Primary
		TOTAL	\$27,000	

**RHODES CONTRIBUTORS'
CONTRIBUTIONS TO THE REID COMMITTEE**

Date of Contribution	Name of Contributor	Employer/Occupation	Amount	Election Designation
6/29/01	Nadine Giudicessi	Rhodes Design/ Controller	\$1,000	General
6/29/01	Nadine Giudicessi	Rhodes Design/ Controller	\$1,000	Primary
6/29/01	Dean L Griffith	Rhodes Design/ General Manager	\$1,000	General
6/29/01	Dean L Griffith	Rhodes Design/ General Manager	\$1,000	Primary
6/29/01	Dirk P Griffith	Rhodes Design/ General Supervisor	\$1,000	General
6/29/01	Dirk P Griffith	Rhodes Design/ General Supervisor	\$1,000	Primary
6/29/01	James A Bevan	Rhodes Design/CFO	\$1,000	General
6/29/01	James A Bevan	Rhodes Design/ CFO	\$1,000	Primary
6/29/01	Mona M Wilcox	Rhodes Framing/ Controller	\$1,000	Primary
6/29/01	Mona M Wilcox	Rhodes Framing/ Controller	\$1,000	General
		TOTAL	\$10,000	

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